



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

DATE: 6-28-96

Brandt Butler
Project Coordinator
DuPont Environmental Remediation Services
Barley Mills Plaza 27/P.O. Box 80027
Wilmington, DE 19880-0027

RE: South Landfill

Dear Mr. Butler,

EPA has reviewed DuPont's "South Landfill Value Engineering Report Addendum" (4/8/96) that was submitted in response to EPA comments dated 2/7/96. EPA approves the alignment of the south landfill slurry wall on the south side of the sewer force main. EPA also approves the "Soil Cover With Drainage Layer" alternative described in Section 2.1 and as modified below.

The most significant modification involves the placement of a geomembrane liner underneath the rip-rap along the riverbank to limit any leaching caused by the tidal changes in the river. The Operation and Maintenance Plan must include physical inspection, and repair if necessary, of the riverbank every six months and after significant high water flows, where the potential for erosion is highest. At the first five-year review, sediment samples should be collected in front of the south landfill to ensure the containment system is working.

EPA has determined that the south landfill remedy described in the 8/16/95 Explanation of Significant Differences (ESD) and modified by this approval letter still meets ARARs and is protective of the environment. Since the waste can be adequately contained with a soil cover and drainage layer and protected from erosion with rip rap along the riverbank, the reduction in volume of treated wastes and the slight increase in mobility of contaminants caused by not isolating all of the waste in the slurry wall is more than offset by the reduced risk of a major catastrophe from a sewer line break and the ecological benefit of allowing trees to remain along the riverbank (which would not have remained if the slurry wall was installed near the riverbank).

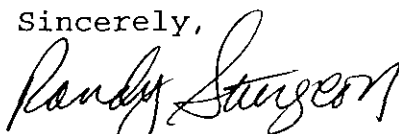
At this time EPA is not approving the construction of a fishing wall although DuPont may propose one in the future if it so desires. Near the James Street Bridge where waste material is at or very near the riverbank, care must be taken during the design and construction to minimize both disturbances to the

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riverbank and encroachment into the river. A minimal amount of fill may need to be placed on the bank in this area to provide a better base for the geomembrane.

EPA also approves the use of a soil-bentonite slurry wall with a concrete cap for the road crossings. If you have any questions regarding this matter, please call me at 215-597-0978.

Sincerely,

A handwritten signature in cursive script that reads "Randy Sturgeon".

Randy Sturgeon
Remedial Project Manager
General Remedial Section

cc: Brian L. Steelman, Ciba
Barbara Okorn, EPA
Peter Knight, NOAA
Ramon Benitez, USACE
Chris Guy, USFWS

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